



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY  
HAZARDOUS WASTE INSPECTIONS & COMPLIANCE UNIT

**HAZARDOUS WASTE INSPECTION REPORT**

**FACILITY NAME:** \_\_\_\_\_

**EPA ID NUMBER:** \_\_\_\_\_

**STREET ADDRESS:** \_\_\_\_\_

**CITY/STATE/ZIP:** \_\_\_\_\_

**TELEPHONE NUMBER:** \_\_\_\_\_

**MAILING ADDRESS:** \_\_\_\_\_

**INSPECTION DATE:** \_\_\_\_\_

**FACILITY REPRESENTATIVE(S) AND TITLE(S):**

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

**ADEQ REPRESENTATIVE(S):**

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

**OTHER PARTICIPANTS/AGENCIES (Name, Agency and Title):**

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

**NOTE:** Any omissions in this report and any accompanying notices shall not be construed as a determination of compliance with applicable regulations. Any regulatory citations to 40 CFR are as adopted by the Arizona Administrative Code, A.A.C. R18-8-201 *et seq.* Photographs available upon request.

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# CONDITIONALLY EXEMPT SMALL QUANTITY GENERATORS (CESQGs)

Inspection Date:

Date of Last Inspection:

## Facility Information & Process


**Key:**    **C** = In Compliance    **N** = Not in Compliance    **N/A** = Not Applicable    **P** = Pending

## Waste Determinations / Generator Status

<p><b>C</b>   <b>N</b>   <b>N/A</b>   <b>P</b></p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Copies</p> <p><input type="checkbox"/></p>	<p>1. Does the facility conduct appropriate Waste Determinations? Waste determination documentation <u>may</u> include:</p> <ul style="list-style-type: none"> <li>Lists of wastes produced</li> <li>Process descriptions</li> <li>Material Safety Data Sheets</li> <li>Waste Profile Sheets</li> <li>Sampling plans</li> <li>Analytical results</li> <li>Raw analytical data and QA/QC documents</li> </ul> <p>40 CFR § 261.5(g)(1)</p>	<p>Comments:</p>
<p><b>C</b>   <b>N</b>   <b>N/A</b>   <b>P</b></p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p><input type="checkbox"/></p>	<p>2. Does the CESQG limit its generation rate to no more than:</p> <ul style="list-style-type: none"> <li>100 kg/month (220 lbs) - non-acute hazardous waste</li> <li>1 kg/month (2.2 lbs) - acute hazardous waste</li> <li>100 kg/month (220 lbs) - acute hazardous waste debris</li> </ul> <p>Note:</p> <ul style="list-style-type: none"> <li>If exceeded, facility has acted as a small quantity generator (SQG) or large quantity generator (LQG).</li> <li>If acute hazardous waste rate is exceeded, facility has acted as an LQG.</li> <li>What specific months have CESQG rates been exceeded?</li> <li>Has this waste been set aside and handled as SQG/LQG? See 51 FR 10153.</li> </ul> <p>40 CFR § 261.5(a) &amp; (e)</p>	<p>Comments:</p>
<p><b>C</b>   <b>N</b>   <b>N/A</b>   <b>P</b></p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p><input type="checkbox"/></p>	<p>3. Does the CESQG limit its total accumulation on site to no more than:</p> <ul style="list-style-type: none"> <li>1000 kilograms total non-acute plus acute Hazardous Waste.</li> <li>1 kilogram total acute Hazardous Waste.</li> <li>100 kilograms total acute Hazardous Waste debris.</li> </ul> <p>Note:</p> <ul style="list-style-type: none"> <li>If exceeded, facility has acted as an SQG or LQG.</li> <li>If acute hazardous waste rate is exceeded, facility has acted as an LQG.</li> <li>What specific months have CESQG accumulation amounts been exceeded?</li> <li>Has this waste been set aside and handled as SQG/ LQG? See 51 FR 10153.</li> </ul> <p>40 CFR § 261.5(g)(2)</p>	<p>Comments:</p>

## Treatment, Storage, and Disposal

<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>1. Does the CESQG prevent the treatment, storage, or disposal of hazardous waste?</p> <p>No evidence of:</p> <ul style="list-style-type: none"> <li>Leaks through inadequately maintained flooring, berms, sumps, cracks, joints, coatings.</li> <li>Fires, explosions, or any releases of hazardous waste or constituents to the environment.</li> </ul> <p>40 CFR § 261.5 / A.A.C. R18-8-270(B)(1)</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Copies</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>2. Does the CESQG dispose its hazardous waste 1) on-site or at 2) an off-site facility, <i>either</i> of which is:</p> <ul style="list-style-type: none"> <li>A permitted or interim status hazardous waste treatment, storage, or disposal facility (TSDF),</li> <li>A facility permitted, licensed, or registered by Arizona to manage municipal or industrial solid waste,</li> <li>A facility that beneficially uses or reuses, or legitimately recycles or reclaims its waste (or treats its waste prior to use, reuse, or recycling), or</li> <li>A universal waste handler or destination facility subject to the universal waste requirements of 40 CFR § 273, if the waste is universal waste?</li> </ul> <p>Note: The CESQG should ensure the designated, disposal, or destination facility knowingly accepts the facility's hazardous waste and meets one of the above requirements.</p> <p>40 CFR § 261.5(f)(3) &amp; (g)(3) / A.A.C. R18-8-261(G)</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>3. Does the CESQG have any hazardous waste mixed with "non-hazardous waste" that exceeds the CESQG quantity limitations and exhibit a characteristic hazardous waste?</p> <p>Does the CESQG have any hazardous waste mixed with "solid waste" that exceeds the CESQG quantity limitations?</p> <p>40 CFR § 261.5(h) &amp; (i)</p>	<p>Comments:</p>

**Location:**

## Small Quantity Handler (SQH) of Universal Waste Management

<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>1. Does the facility prevent the on-site disposal, dilution or treatment of universal waste?</p> <p>Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact. See 40 CFR § 273.13.</p> <p>40 CFR § 273.11 / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>2. If mercury containing ampules are removed from thermostats, has the handler met ALL of the following:</p> <ul style="list-style-type: none"> <li>Ampules are removed in a manner that prevents breakage.</li> <li>Removal is conducted over a containment device.</li> <li>Spills or leaks are cleaned up immediately.</li> <li>Removal is performed in a well ventilated, monitored environment.</li> </ul> <p>Note: If the above conditions are not met, the facility may be required to obtain a permit.</p> <p>40 CFR § 273.13(c) / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>3. Are universal waste batteries (a), pesticides (b), mercury-containing material (i.e. thermostats) (c), and lamps (d) placed in closed, structurally sound containers adequate to prevent breakage or a release to the environment?</p> <p>40 CFR § 273.13 / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>4. Are all universal wastes labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or marked as "Universal Waste"?</p> <p>40 CFR § 273.14 / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p style="text-align: center;"><input type="checkbox"/></p>	<p>5. Is universal waste dated from the date generated or received from another handler?</p> <p>Length of accumulation time may be demonstrated by ANY of the following:</p> <ul style="list-style-type: none"> <li>Mark or label each container with the earliest date the waste is generated or received.</li> <li>Mark or label the individual item of waste with the date it was generated or received.</li> <li>Maintain an inventory system identifying the date the waste was generated or received.</li> <li>Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received.</li> <li>Use some other method that clearly demonstrates the length of accumulation time.</li> </ul> <p>40 CFR § 273.15(c) / A.A.C. R18-8-273</p>	<p>Comments:</p>

## (SQH Universal Waste Management continued)

<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p><input type="checkbox"/></p>	<p>6. Is universal waste accumulated for no longer than one year from the date generated or received from another handler?</p> <p>Note: The generator will be a large quantity generator of universal waste if inventory exceeds 5,000 kg (11,025 lb) on site.</p> <p>40 CFR § 273.15(a) / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p><input type="checkbox"/></p>	<p>7. If there was a release of universal waste, were all releases of universal waste and other residues from universal wastes immediately contained?</p> <p>Note: Universal waste batteries (a), pesticides (b), mercury-containing material (i.e. thermostats) (c), and lamps (d) that are broken or show evidence of leakage or spillage must be placed in closed, structurally sound containers and managed accordingly. Wastes that are generated by handling or cleaning up spills of universal wastes must be managed according to hazardous waste or solid waste rules.</p> <p>40 CFR § 273.13 / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Photograph(s)</p> <p><input type="checkbox"/></p>	<p>8. Are pesticides placed in a container, tank, transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste?</p> <p>Note: Containers, tanks, or transport vehicles of recalled pesticides must be additionally marked with the label that was on or accompanied the product when it was sold or distributed.</p> <p>40 CFR § 273.13(b)(4) / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Copies</p> <p><input type="checkbox"/></p>	<p>9. Are employees trained on the proper handling and emergency procedures appropriate to the types of universal waste handled at the facility?</p> <p>40 CFR § 273.16 / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Copies</p> <p><input type="checkbox"/></p>	<p>10. Does the facility send the universal waste to an appropriate recycler, destination facility, foreign destination or another handler?</p> <p>40 CFR § 273.18 / A.A.C. R18-8-273</p>	<p>Comments:</p>
<p>C   N   N/A   P</p> <p><input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/>   <input type="checkbox"/></p> <p>Copies</p> <p><input type="checkbox"/></p>	<p>11. Do records for each shipment of universal waste sent off-site contain the following information:</p> <ul style="list-style-type: none"> <li>• The name and address of the facility to which the waste was sent.</li> <li>• The quantity of each type of universal waste sent.</li> <li>• The date the shipment of universal waste left the facility.</li> </ul> <p>Note: Records must be retained for at least 3 years from the date the shipment was received or from the date the shipment left the facility.</p> <p>40 CFR § 273.18 / A.A.C. R18-8-273</p>	<p>Comments:</p>